IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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REBECCA BROWN, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:20-cv-00064-MJH-LPL
)	
TRANSPORTATION SECURITY)	
ADMINISTRATION, et al.,)	
)	
Defendants.)	
)	

CONSENT MOTION TO EXTEND TIME TO FILE ANSWER AND SERVE INITIAL DISCLOSURES

Defendants Transportation Security Agency ("TSA"), TSA Administrator David P. Pekoske, the Drug Enforcement Administration ("DEA"), DEA Acting Administrator D. Christopher Evans, and the United States of America (together, the "Government Defendants"), by and through undersigned counsel, respectfully move for a 14-day extension of time, from May 13, 2021, to May 27, 2021, to file their answer to Plaintiffs' amended complaint, and a 14-day extension of time, from May 14 to May 28, 2021, for the parties to serve their initial disclosures pursuant to Rule 26(a)(1). Plaintiffs consent to this request.

- 1. On March 30, 2021, the Court issued an order denying the Government Defendants' motion to dismiss with respect to Counts I-III of the Plaintiffs' first amended complaint. (ECF No. 79).
- 2. Pursuant to Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure, the Government Defendants' answer was originally due on April 13, 2021. Plaintiffs' first amended

complaint is over 100 pages long, and the Court previously granted an extension to May 13, 2021 for the Government Defendants to file their answer. Pursuant to the case management schedule entered by the Court, the parties' initial disclosures are due on May 14, 2021.

- 3. Last week, undersigned counsel for the Government Defendants had a medical emergency, which disrupted her work on this and other cases. Because of continuing medical uncertainties and appointments, and conflicting deadlines in another case, the Government Defendants respectfully request a 14-day extension of their answer deadline, from May 13, 2021, to May 27, 2021, and a 14-day extension of the deadline for the parties to serve their Rule 26(a)(1) initial disclosures, from May 14, 2021, to May 28, 2021.
- 4. This is the Government Defendants' second request for an extension of time to file their answer following the Court's denial of their motion to dismiss, and their first request for an extension of the initial disclosures deadline. Plaintiffs consent to this request.

Dated: May 11, 2021 Respectfully submitted,

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/s/ Elizabeth Tulis

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